

MELINDA HAAG (CABN 132612)  
United States Attorney

DAVID R. CALLAWAY (CABN 121782)  
Chief, Criminal Division

FRANK J. RIEBLI (CABN 221152)  
Assistant United States Attorney  
450 Golden Gate Avenue, Box 3605  
San Francisco, California 94102-3499  
Telephone: (415) 436-7200  
FAX: (415) 436-7234  
[Frank.Riebli@usdoj.gov](mailto:Frank.Riebli@usdoj.gov)

Attorneys for United States of America

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

## SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) CASE NO. CR 15-371 JST  
Plaintiff, )  
v. )  
JOSE LUIS RUIZ MALDONADO, and ) STIPULATION AND  
HUBER RUIZ MALDONADO, ) [PROPOSED]  
Defendants. ) ORDER EXCLUDING TIME  
 )  
 )

On August 28, 2015, the government and defendants Jose Luis Ruiz Maldonado and Huber Ruiz Maldonado appeared through counsel in this matter. It was the parties' first appearance. The parties informed the Court that the government has produced discovery to the defendants and is in the process of producing additional materials that the defense has requested. The government also represented that it was discussing resolution with one of the defendants. The parties agreed that the defendants need additional time to review the discovery and evaluate any potential defenses and or resolutions. Accordingly, the parties agreed that time should be excluded between August 28, 2015, and the date of the next appearance, October 9, 2015, in order to allow for the effective preparation of counsel.

**STIPULATION AND ORDER EXCLUDING TIME  
CR 15-371 JST**

1 The parties agree that the ends of justice served by granting the continuance outweigh the best interest of  
2 the public and the defendant in a speedy trial.

3 DATED: August 28, 2015

Respectfully submitted,

4 MELINDA HAAG  
United States Attorney

5  
6 \_\_\_\_\_/s/  
7 FRANK J. RIEBLI  
Assistant United States Attorney

8 \_\_\_\_\_/s/ Frank Riebli w/ permission  
9 EDWARD SMOCK  
Attorney for Jose Luis Ruiz  
10 Maldonado

11 \_\_\_\_\_/s/ Frank Riebli w/ permission  
12 SCOTT SUGARMAN  
Attorney for Huber Ruiz Maldonado

14 For the reasons stated above, the Court finds that the exclusion of time from August 28, 2015  
15 through and including October 9, 2015 is warranted and that the ends of justice served by the  
16 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §  
17 3161(h)(7)(A). The failure to grant the requested continuance would deny the defendants effective  
18 preparation of counsel, and would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv).

19 SO ORDERED.

20 DATED: August 31, 2015

  
21 HONORABLE JON S. TIGAR  
United States District Judge